CRA

Section 1

US EPA RECORDS CENTER REGION 5

**CONESTOGA-ROVERS & ASSOCIATES** 

1801 Old Highway 8, Suite 114 St. Paul, Minnesota 55112 (612) 639-0913 Fax:(612) 639-0923

Reference No. 3481

April 10, 1995

Ms. Sheri Bianchin UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) Region V (HSRL-6J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590 Ms. Holly Grejda INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM) 100 N. Senate IGCN-1255 Indianapolis, Indiana 46204

Dear Ms. Bianchin and Ms. Grejda:

Re: Monthly Progress Report ACS Superfund Site Griffith, Indiana

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the American Chemical Service (ACS) Remedial Design/Remedial Action (RD/RA) program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

## Summary of Activities - March/April 1995

- Montgomery Watson met with ACS representatives to coordinate upcoming RD/RA work.
- An aquifer pumping test and the collection of leachate/groundwater samples from source areas were conducted in accordance with the report: "Perimeter Groundwater Containment System, RD/RA Work Flan" (Agency Review Draft) prepared by Montgomery Watson, dated February 1995. This work was verbally authorized by USEPA.
- In a letter, dated March 15, 1995, USEPA restated procedures for communication and submittals on the project.
- The design workshop was held at USEPA on March 22, 1995 to discuss upcoming plans for the Perimeter Groundwater Containment System and predesign studies. This meeting was summarized in a memo, dated April 3, 1995.

April 10, 1995

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 On March 23, 1995, Ron Frehner (CRA), Sheri Bianchin (USEPA) and Holly Grejda (IDEM) met to discuss technical considerations associated with a proposed disbursement of de minimis funds.

## Sampling Results - March/April 1995

• Sampling of monitoring wells was conducted in December 1994/January 1995. These results were validated and provided to USEPA/IDEM with the March 8, 1995 progress report. These results are also summarized along with interpretation in a technical memo provided to USEPA/IDEM in early April.

#### Upcoming Work Completion - April 1995 to June 1995

Upcoming work completions are summarized by the following action items. The target due dates reflect priorities of work to be completed and are subject to change. These dates do not reflect compliance requirements which will be established by the approved schedule.

Description		Action By	Target Due Date
1.	Evaluate effluent limits for groundwater treatment plant	IDEM/MW	3/95
2.	Technical Meeting	All	4/19/95
3.	Provide comments on Predesign Work Plan and Perimeter Groundwater Containment System RD Work Plan	USEPA/IDEM	4/95
4.	Prepare an assessment of potential Lower Aquifer Contamination	MW	4/95
5.	Closure and potential replacement of monitoring well MW4D - IDEM to contact the City of Griffith	IDEM	4/95

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Description		, Action By	Target Due Date
6.	USEPA/IDEM comments on dewatering barrier wall alignment	USEPA/IDEM	4/95
7.	USEPA/IDEM comments on Perimeter Groundwater Containment System alignment	USEPA/IDEM	4/95
8.	Work Plan for boreholes for dewatering barrier wall alignment	MW	4/95
9.	Prepare list of deliverables	CRA	4/95
10.	USEPA approval of Pumping Test Work Plan	USEPA	4/95
11.	Proposal for waste classification of sludge generated from Perimeter Groundwater Containment System	MW	4/95
12.	Written approval of schedule	USEPA/IDEM	4/95
13.	Replace tarp over drums of investigation residuals	MW	4/95
14.	Amend Health and Safety Plan (HASP) to outline entry procedures	MW/ACS	4/95
15.	Evaluate Corps of Engineers review/permit requirements for discharge to wetlands from groundwater treatment	MW	4/95
16.	Provide HASP on-Site	MW	4/95
17.	Evaluate whether clean closure for USTs was conducted	IDEM	4/95

April 10, 1995

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Des	cription	Action By	Target Due Date
18.	Select date for public availability session	USEPA/IDEM	5/95
19.	Prepare a letter outlining acceptance or approval of RI/FS	USEPA	5/95
20.	Start Predesign Studies	MW	5/95
21.	Install fence	MW	5/95
22.	Dewatering System Design	MW	Ongoing
23.	Interim Design for Perimeter Groundwater Containment System	MW	Ongoing

## Anticipated Problems and Delays

To date, the project schedule stipulated on pages 30/31 of the Statement of Work has been met. However, the draft schedule submitted to the USEPA and IDEM will require adjustment due to the change in USEPA project managers. Once comments on the Predesign Work Plan and Perimeter Groundwater Containment System RD Work Plan have been completed, an adjusted schedule will be developed.

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

Sincerely,

**CONESTOGA-ROVERS & ASSOCIATES** 

Ronald Frehner

RF/br



1801 Old Highway 8, Suite 114 St. Paul, Minnesota 55112



Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
Attn: HSRL - 6J
Region V

77 West Jackson Boulevard Chicago, IL 60604

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1801 Old Highway 8, Suite 114 St. Paul, Minnesota 55112

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May 9, 1995

Reference No. 3481

Ms. Sheri Bianchin UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) Region V (HSRL-6J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Ms. Holly Grejda INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM) 100 N. Senate IGCN-1255 Indianapolis, Indiana 46204

Dear Ms. Bianchin and Ms. Grejda:

Re: Monthly Progress Report ACS Superfund Site Griffith, Indiana

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the American Chemical Service (ACS) Remedial Design/Remedial Action (RD/RA) program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

## Summary of Activities - April 1995

- A summary of the March 22, 1995 technical meeting was provided to the USEPA in early April.
- USEPA's continued their review of the Predesign Work Plan, Perimeter Groundwater Containment Plan and Schedule.
- Technical meetings scheduled for April were postponed at USEPA's request due to their need for extra time to review the work plans.

## Sampling Results - March/April 1995

Sampling of monitoring wells was conducted in December 1994/January 1995. These results were summarized and interpreted in a technical memo provided to USEPA/IDEM in early April.

May 9, 1995

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Reference No. 3481

# Upcoming Work Activities - May 1995 to July 1995

Upcoming work activities are summarized by the following action items.

Description		Action By
1.	Technical Meeting	All
2.	Provide comments on Predesign Work Plan and Perimeter Groundwater Containment System RD Work Plan	USEPA/IDEM
3.	Prepare an assessment of potential Lower Aquifer Contamination	MW
4.	USEPA/IDEM comments on dewatering barrier wall alignment	USEPA/IDEM
5.	USEPA/IDEM comments on Perimeter Groundwater Containment System alignment	USEPA/IDEM
6.	Work Plan for boreholes for dewatering barrier wall alignment	MW
7.	USEPA written approval of Pumping Test Work Plan	USEPA
8.	Proposal for waste classification of sludge generated from Perimeter Groundwater Containment System	MW
9.	Written approval of schedule	USEPA/IDEM
10.	Evaluate whether clean closure for USTs was conducted	IDEM
11.	Select date for public availability session	USEPA/IDEM
12.	Prepare a letter outlining acceptance or approval of RI/FS	USEPA
13.	Start Predesign Studies	MW
14.	Install fence	MW
15.	Dewatering System Design	MW
16.	Interim Design for Perimeter Groundwater Containment System	MW

May 9, 1995

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Reference No. 3481

#### Anticipated Problems and Delays

To date, the project schedule stipulated on pages 30/31 of the Statement of Work has been met. However, the draft schedule submitted to the USEPA and IDEM will require adjustment due to the change in USEPA project managers and the resultant delay in providing comments and approvals on work plans. Once comments on the Predesign Work Plan and Perimeter Groundwater Containment System RD Work Plan have been completed, an adjusted schedule will be developed.

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

Ronald Frehner

RF/br



March 8, 1995

#### **CONESTOGA-ROVERS & ASSOCIATES**

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Reference No. 3481

Mr. Bill Bolen
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Bolen and Ms. Grejda:

Re: Monthly Progress Report

ACS NPL Site
Griffith, Indiana

Ms. Holly Grejda
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
100 N. Senate IGCN-1255
Indianapolis, Indiana 46204



OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA. REGION V

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the ACS RD/RA program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

#### Summary of Activities - February 1995

- In January, the ACS PRP Group prepared a letter outlining the proposed RD schedule. This amended RD schedule was accepted based on telephone conversations with USEPA on February 2, 1995 and IDEM on February 3, 1995. Based on these conversations, Montgomery Watson finalized the schedule.
- In a letter to USEPA, dated February 3, 1995, CRA summarized the procedures to be used for risk assessment under performance verification.
- Access agreements for the predesign studies have been secured or are in the process of being obtained.
- The Predesign Work Plan was submitted to the USEPA and IDEM on February 6, 1995 in accordance with the approved schedule.
- The Remedial Design Work Plan for the perimeter groundwater collection system was submitted to the USEPA and IDEM on February 7, 1995 in accordance with the approved schedule.

March 8, 1995

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Reference No. 3481

### Sampling Results - February 1995

• Sampling of monitoring wells was conducted in December 1994. These results are attached.

#### Upcoming Work - March 1995 to May 1995

- Comments from USEPA and IDEM on the Perimeter Groundwater Containment System RD and the Predesign Work Plan are expected by March 7, 1995.
- Montgomery Watson plan to install a test extraction well and conduct an aquifer pumping test the week of March 13, 1995.
- A design workshop meeting will be held to discuss plans for the perimeter groundwater containment system and predesign studies.
- The intermediate design for the perimeter groundwater containment system will be prepared.
- The perimeter fence will be installed.
- The design of the dewatering system for pilot studies will be submitted to USEPA/IDEM.

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

Sincerely,

**CONESTOGA-ROVERS & ASSOCIATES** 

Ronald Frehner

RF/br

CRA

**CONESTOGA-ROVERS & ASSOCIATES** 

1801 Old Highway 8, Suite 114 St. Paul, Minnesota 55112 (612) 639-0913 Fax:(612) 639-0923

June 9, 1995

Reference No. 3481

Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY (USEPA)
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Ms. Holly Grejda
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT (IDEM)
100 N. Senate IGCN-1255
Indianapolis, Indiana 46204

Dear Ms. Bianchin and Ms. Grejda:

Re: Monthly Progress Report ACS Superfund Site Griffith, Indiana

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the American Chemical Service (ACS) Remedial Design/Remedial Action (RD/RA) program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

#### Summary of Activities - May 1995

- USEPA continued their review of the Predesign Work Plan, Perimeter Groundwater Containment Plan (PGCS).
- Technical meetings scheduled for May were postponed at USEPA's request due to their need for extra time to review the work plans.
- In a letter, dated May 10, 1995, the Barrier Wall Alignment Work Plan was submitted to USEPA and IDEM for review and comment.
- IDEM records of closure of two underground storage tanks (USTs) at the City of Griffith garage property (near MW6) were reviewed by IDEM.
- On May 26, 1995, USEPA provided draft comments on the Predesign Work Plan (including the Quality Assurance Project Plan and the Site Safety Plan) and the PGCS RD/RA Work Plan. Final comments are expected in June 1995.
- In a letter to USEPA, dated May 30, 1995, Ron Frehner of CRA confirmed a telephone conversation with Sheri Bianchin that revised work plans are due 21 days after receipt of final comments, rather than 21 days after draft comments.

June 9, 1995

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Reference No. 3481

## Sampling Results - May 1995

Geoprobe sampling and aquifer pumping results were validated in May and are attached.

## Upcoming Work Activities - June 1995 to August 1995

Uncoming work activities are summarized by the following action items

Upcoming work activities are summarized by the following action items.		
<ul><li>Description</li><li>Technical Meeting (scheduled for June 14, 1995)</li></ul>	Action By All	
<ul> <li>Provide final comments on Predesign Work Plan and PGCS RD Work Plan</li> </ul>	USEPA/IDEM	
<ul> <li>Prepare an assessment of potential Lower Aquifer conditions (for oral presentation at the June 14, 1995 technical meeting)</li> </ul>	MW	
• USEPA/IDEM comments on dewatering barrier wall alignment	USEPA/IDEM	
<ul> <li>USEPA written approval of Pumping Test Work Plan (Note: Pump test was performed on March 20 -21, 1995 in accordance with USEPA and IDEM oral approval and oversight.)</li> </ul>	USEPA	
<ul> <li>Written confirmation of approval of schedule (part of Predesign Work Plan)</li> </ul>	USEPA/IDEM	
<ul> <li>Written confirmation of acceptance or approval of RI/FS</li> </ul>	USEPA	
<ul> <li>Start Predesign Studies (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW	
<ul> <li>Install fence (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW	
<ul> <li>Dewatering System Design (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW	
<ul> <li>Interim Design for PGCS (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW	

June 9, 1995

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Reference No. 3481

#### Anticipated Problems and Delays

To date, the project schedule stipulated on pages 30/31 of the Statement of Work has been met. However, the schedule submitted to the USEPA and IDEM will require adjustment due to the change in USEPA project managers and the resultant delay in providing comments and approvals on work plans. That schedule was orally approved by USEPA and IDEM prior to the change in project managers. Once final comments on the Predesign Work Plan and PGCS RD Work Plan have been completed, an adjusted schedule will be developed.

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

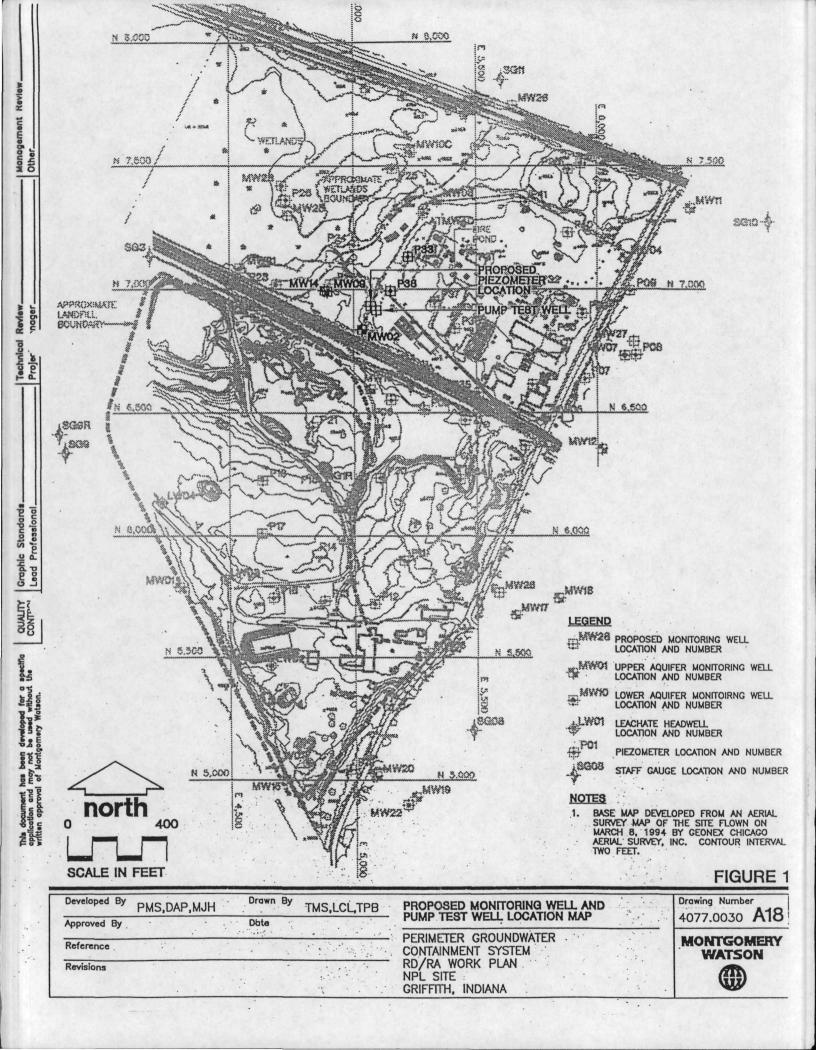
Sincerely,

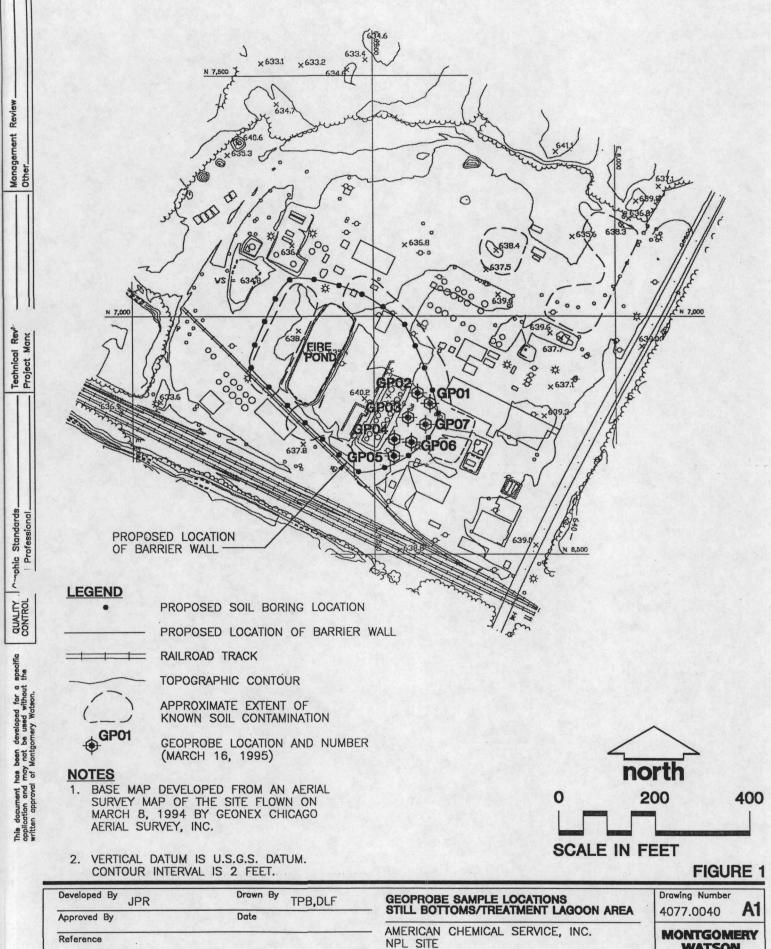
**CONESTOGA-ROVERS & ASSOCIATES** 

Ronald Frehner

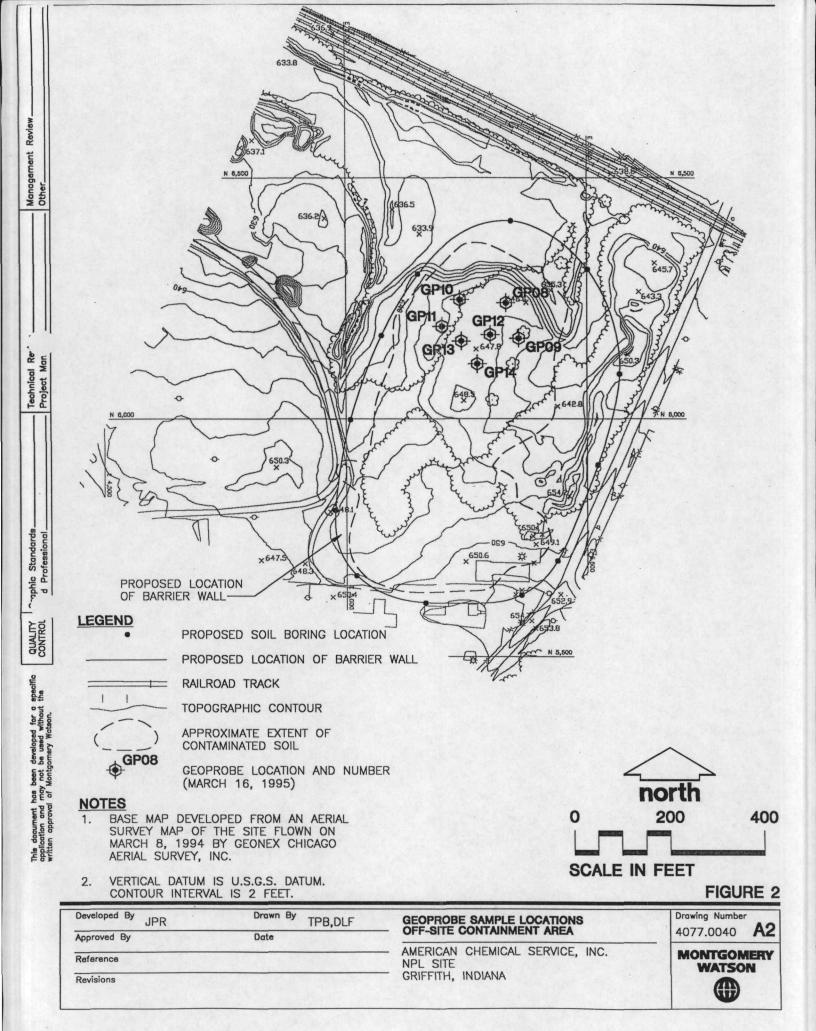
RF/br Enc.

c.c. ACS Executive and Technical Committees (w/o Enc.)





NPL SITE WATSON GRIFFITH, INDIANA Revisions



CRA

**CONESTOGA-ROVERS & ASSOCIATES** 

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July 10, 1995

# - ORIGINAL -

Reference No. 3481

THIS DOCUMENT PREVIOUSLY TRANSMITTED BY TELECOPIER

Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY (USEPA)
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Ms. Holly Grejda
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT (IDEM)
100 N. Senate IGCN-1255
Indianapolis, Indiana 46204

Dear Ms. Bianchin and Ms. Grejda:

Re: Monthly Progress Report ACS Superfund Site Griffith, Indiana

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the American Chemical Service (ACS) Remedial Design/Remedial Action (RD/RA) program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

# Summary of Activities - June 1995

- USEPA continued their review of the Predesign Work Plan, Perimeter Groundwater Containment Plan (PGCS) and Barrier Wall Alignment Work Plan. On May 26, 1995, USEPA provided draft comments on the Predesign Work Plan (including the Quality Assurance Project Plan and the Site Safety Plan) and the PGCS RD/RA Work Plan. Final comments are expected in July 1995 and revised work plans are due 21 days following receipt of final comments.
- A technical meeting was held on June 14, 1995 to discuss USEPA/IDEM draft comments on the work plans.
- On June 15, 1995, Montgomery Watson collected groundwater samples from the On-Site Containment Area. Water treatment vendors will use the samples to prepare proposals for the PGCS treatment system.
- Black and Veatch have been retained by USEPA to develop a work plan as the ACS oversight contractor. Black and Veatch are currently getting up to speed on the project.
- A technical meeting on groundwater issues and monitoring wells was held on June 22, 1995. The meeting, attended by Montgomery Watson, USEPA and IDEM, was held to discuss draft USEPA comments on the Predesign Work Plan and the PGCS RD/RA Work Plan.

July 10, 1995

Description

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Reference No. 3481

Action By

• A letter of proposed effluent standards for the PGCS was provided to USEPA in a letter, dated June 20, 1995.

## Sampling Results - June 1995

No sampling results were received in June 1995.

## <u>Upcoming Work Activities - July 1995 to September 1995</u>

Upcoming work activities are summarized by the following action items.

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<ul> <li>Provide final comments on Predesign Work Plan and PGCS RD Work Plan</li> </ul>	USEPA/IDEM
USEPA/IDEM comments on dewatering barrier wall alignment	USEPA/IDEM
<ul> <li>USEPA written approval of Pumping Test Work Plan (Note: Pump test was performed on March 20 -21, 1995 in accordance with USEPA and IDEM oral approval and oversight.)</li> </ul>	USEPA
Written confirmation of approval of schedule	USEPA/IDEM
<ul> <li>Start Predesign Studies (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	M W
<ul> <li>Install fence (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW
<ul> <li>Dewatering System Design (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW
<ul> <li>Interim Design for PGCS (subject to amended schedule and receipt of USEPA approval of work plan)</li> </ul>	MW
<ul> <li>Technical meeting to discuss final comments on Predesign and PGCS work plans</li> </ul>	USEPA/IDEM/MW

July 10, 1995

Reference No. 3481

## Anticipated Problems and Delays

To date, the project schedule stipulated on pages 30/31 of the Statement of Work has been met. However, the schedule submitted to the USEPA and IDEM will require adjustment due to the change in USEPA project managers and the continuing delay in providing comments and approvals on work plans. That schedule was orally approved by USEPA and IDEM prior to the change in project managers. Once final comments on the Predesign Work Plan and PGCS RD Work Plan have been completed, an adjusted schedule will be developed.

- 3 -

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

Sincerely,

**CONESTOGA-ROVERS & ASSOCIATES** 

RF/br



1801 Oid Highway 8, Suite 114 St. Paul, Minnesota 55112

(612) 639-0913

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September 8, 1995

Reference No. 3481

Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY (USEPA)
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Ms. Holly Grejda
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT (IDEM)
100 N. Senate IGCN-1255
Indianapolis, Indiana 46204

Dear Ms. Bianchin and Ms. Grejda:

Re: Monthly Progress Report
ACS Superfund Site
Griffith, Indiana

This progress report is submitted on behalf of the Respondents to the Unilateral Administrative Order (UAO) and provides a summary of work completed and upcoming for the American Chemical Service (ACS) Remedial Design/Remedial Action (RD/RA) program. This progress report is submitted pursuant to Paragraph 48 of the UAO.

## Summary of Activities - August 1995

- In a letter, dated August 15, 1995, CRA provided follow up and a response to USEPA's letters of July 20, 1995.
- By letters, dated August 10, 1995, August 16, 1995 and August 17, 1995, Montgomery Watson transmitted revised work plans as required by USEPA and the UAO. These documents were as follows:
  - Revised Site Safety Plan;
  - Revised Quality Assurance Project Plan/Field Sampling Plan;
  - Revised Dewatering/Barrier Wall Alignment Work Plan;
  - Revised Predesign Work Plan;
  - Revised Perimeter Groundwater Containment System RD/RA Work Plan; and
  - Response to Comments on Expedited Groundwater Technical Memorandum.

## Sampling Results - August 1995

No validated sample results were received in August.

# Upcoming Work Activities - September 1995 to November 1995

 A meeting of USEPA, IDEM and the ACS Group to review and discuss the project schedule and to discuss the Perimeter Groundwater Containment System (PGCS) design is planned for September 12, 1995. September 8, 1995

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Reference No. 3481

- The 50% design submittal for the PGCS is scheduled for submission to USEPA and IDEM by September 30, 1995. The submission of this design is contingent upon resolving effluent standards for the treatment plant discharge.
- Effluent standards for treated groundwater discharge need to be finalized. USEPA and IDEM are reviewing Montgomery Watson's proposed standards. These standards are critical to the treatment plant design.
- Montgomery Watson is scheduled to begin drafting the Operation and Maintenance (O&M), Quality Assurance Project Plan (QAPP), and Field Sampling Plan (FSP) for the PGCS in November 1995.
- Montgomery Watson is scheduled to begin the final design of the PGCS in November 1995 after USEPA/IDEM review and comment on the 50% design submittal.
- Montgomery Watson is scheduled to prepare a QAPP Addendum to reflect the scope of the bench scale and pilot tests for the predesign after USEPA approves the Predesign Work Plan.
- The Predesign field investigations are scheduled to begin this fall.
- The RD Work Plan is scheduled for submission to USEPA and IDEM in October 1995.
- The Site fence is schedule for installation this fall.
- Fabrication of the PGCS treatment plant building is scheduled for this fall.

Upcoming work activities are summarized by the following action items.

Description		Action By
•	USEPA written approval of Pumping Test Work Plan (Note: Pump test was performed on March 20 -21, 1995 in accordance with USEPA and IDEM oral approval and oversight.)	USEPA
•	Written confirmation of approval of schedule	USEPA
•	Start Predesign Studies (subject to amended schedule and receipt of USEPA approval of work plan)	MW
•	Install fence (subject to amended schedule and receipt of USEPA approval of work plan)	MW

Reference No. 3481

-3-Action By Description Barrier Wall Dewatering System Design (subject to amended schedule and receipt of USEPA approval of work plan) MWInterim Design for PGCS (subject to amended schedule and receipt of USEPA approval of work plan) MWUSEPA/IDEM USEPA and IDEM review of proposed effluent standards Prepare list of deliverables MWContinue technical discussions on scope of work required for Lower Aquifer characterization; performance standards and point of compliance USEPA/IDEM/MW Check with City of Griffith for information on landfill monitoring wells **IDEM** Check with health department for information on past residential well sampling MW

## Anticipated Problems and Delays

September 8, 1995

To date, the project schedule stipulated on pages 30/31 of the Statement of Work has been met. The schedule originally submitted to the USEPA and IDEM in February has been adjusted now that final comments on the Predesign Work Plan and PGCS RD Work Plan have been completed.

If there are any questions regarding this progress report, please do not hesitate to contact CRA at 612-639-0913.

Sincerely,

**CONESTOGA-ROVERS & ASSOCIATES** 

for Ronald Frehner

Beruta Tolonson

RF/br